

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Tel 202.955.8500
gibsondunn.com

Molly T. Senger
Direct: +1 202.955.8571
Fax: +1 202.530.4209
MSenger@gibsondunn.com

April 15, 2024

VIA ECF

The Honorable Robyn F. Tarnofsky
United States Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Mehta v. DLA Piper LLP*, Case No. 1:23-cv-04757-AT

Dear Judge Tarnofsky:

Pursuant to the Court's March 29, 2024 Order (ECF No. 46), Plaintiff Anisha Mehta and Defendant DLA Piper LLP (US) (collectively, the "parties") write to provide the Court with the schedule for remaining discovery.

To date, Plaintiff has served three sets of Requests for Production and one set of Interrogatories. DLA Piper's responses and objections to Plaintiff's third set of Requests for Production are due on May 2, 2024. Plaintiff has conducted three depositions—of DLA Piper partners Keith Medansky, Gina Durham, and Heather Dunn—and a fourth deposition is scheduled for April 18, 2024.

DLA Piper has served one set of Requests for Production, one set of Interrogatories, and two sets of Requests for Admission. Plaintiff's responses and objections to DLA Piper's second set of Requests for Admission are due on May 3, 2024. DLA Piper conducted Plaintiff's deposition on March 21, 2024. DLA Piper intends to serve any-third party discovery by April 19, 2024, and to conduct any further depositions by May 3, 2024.

The parties are continuing to meet-and-confer regarding discovery disputes as they arise, and have a meet and confer scheduled for tomorrow afternoon. Currently, discovery is scheduled to close on May 3, 2024.

On Behalf of Plaintiff Only:

Plaintiff wishes to advise the Court of significant discovery issues that will impact the schedule for remaining discovery. The parties have a meet and confer scheduled for tomorrow afternoon to discuss numerous outstanding disputes. Should the parties fail to resolve the disputes at the meet and confer, Plaintiff is prepared to submit a letter to the Court tomorrow requesting permission to file a motion to compel. Also, in the event the parties cannot resolve additional disputes at the meet and confer, Plaintiff intends to seek permission to file a motion for leave to amend her complaint.

GIBSON DUNN

The Honorable Robyn F. Tarnofsky
United States District Court for the Southern District of New York
April 15, 2024
Page 2

On Behalf of DLA Piper Only:

DLA Piper believes that it is premature to bring any discovery disputes to the attention of the Court, given that the parties are scheduled to meet and confer tomorrow afternoon. In addition, DLA Piper is confused by Plaintiff's reference to "significant discovery issues that will impact the schedule," given that Plaintiff has not noticed any depositions that are not scheduled and has not served any third-party discovery at this time. DLA Piper also does not understand the basis upon which Plaintiff would seek leave to amend her complaint, and, in any event, the deadline to move to amend the complaint expired in November 2023. *See* ECF No. 30. To the extent that Plaintiff proceeds to seek leave to file such a motion, DLA Piper will oppose that request.

Respectfully submitted,

/s/ Jeanne M. Christensen

Jeanne M. Christensen
Wigdor LLP
85 Fifth Avenue
New York, NY 10003
Telephone: (212) 257-6800
jchristensen@wigdorlaw.com

Counsel for Plaintiff

/s/ Molly T. Senger

Molly T. Senger, *pro hac vice*
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue NW
Washington, DC 20036
Telephone: (202) 955-8571
msenger@gibsondunn.com

Counsel for Defendant